

United States Courts
Southern District of Texas
FILED

OCT 4 - 2018

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

Joanna Cecilia Lawrence

CRIMINAL COMPLAINT

Case Number: 2:18mj 4295

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about October 2, 2018 in Kenedy County, in the Southern District of Texas defendant, **Joanna Cecilia Lawrence**

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324.
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:
Official Title

See Attached Affidavit of U.S. Border Patrol Agent

Juan Rojas

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

October 4, 2018

Date

B. Janice Ellington U.S. Magistrate Judge

Name and Title of Judicial Officer

Juan Rojas
Signature of Complainant

Juan Rojas
Printed Name of Complainant

at Corpus Christi, Texas
City and State

B. Janice Ellington
Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

FACTS/PROBABLE CAUSE:

On October 2, 2018, a Ford Focus entered the primary inspection lane at the U.S. Border Patrol Checkpoint, located near Falfurrias, Texas. The primary agent observed the sole driver, later identified as Joanna Cecilia Lawrence. As Lawrence arrived to the primary area, she failed to stop and the agent had to yell for her to stop. The agent observed that she was acting nervously. The agent then asked her if she was travelling by herself and she answered by saying that she was. The agent noticed that she was acting nervous and speaking with a slightly nervous tone in her voice when responding to the agent's questions. As the agent was speaking with her, Lawrence took her foot off the brake pedal and the vehicle began to roll forward. After that incident, the agent asked her for consent to look in the trunk and she said "OK". Lawrence willingly pressed the release trunk lid button, which opened the trunk lid. Upon opening the complete trunk lid, the agent viewed two men laying down within the trunk.

The vehicle was taken to the secondary area where the concealed subjects were taken out of the vehicle's trunk. Agents determined that the two men, whom were later identified as Francisco Meza-Carmona and Rubens Rodrigues-Andrade, were illegally present in the United States.

MIRANDA WARNINGS:

Principal: Joanna Cecilia Lawrence

Joanna Cecilia Lawrence was read her Miranda Rights and Warnings in her preferred language of English, as per Service Form CBP I-214. Lawrence signed the form stating that she read and understood her rights and was willing to make a statement without a lawyer present.

STATEMENT SUMMARY:

Principal: Joanna Cecilia Lawrence

Joanna Cecilia Lawrence stated that an acquaintance, Alyssa, asked her to drive two illegal aliens through the checkpoint to Kingsville, Texas. Upon arriving to Kingsville, she was supposed to drop off the two men at either the McDonald's or Walmart. Lawrence stated that Alyssa drove her to a park near the university and airport area, where there was a white car waiting for her. Lawrence stated that when they arrived to the park, that one of the illegal aliens was sitting at a table. She then stated that she got out of Alyssa's car and walked inside a building to use the bathroom, and upon returning to the white vehicle both of the smuggled aliens were sitting in the backseat. She then got into the car and drove north until arriving to the checkpoint. She also stated that shortly before arriving to the checkpoint, that both of the men lowered one of the seats and entered the trunk and raised the seat again.

When asked how much she was going to be paid to smuggle the men through the checkpoint, she stated that she was going to receive the car as payment and that she was told that the title had

already been transferred into her name. When asked if she knew that the two men were illegal aliens, she answered by saying "Of course."

At the time of her arrest, 1 gram of cocaine was found in a small pink case which was in her purse. In addition to the one gram of cocaine, 27 pills of Clonazepam were also discovered in her possession. When asked if both the cocaine and Clonazepam were hers, Lawrence stated that the cocaine was, but not the Clonazepam.

NOTE:

Joanna Cecilia Lawrence has an administrative alien smuggling case dated 08/31/2018.

MIRANDA WARNINGS:

Material Witness: Francisco Meza-Carmona

Francisco Meza-Carmona was read his Miranda Rights and Warnings in his preferred language of English, as per Service Form CBP I-214. Meza signed the form stating that he read and understood his rights but was not willing to make a statement without a lawyer present.

STATEMENT SUMMARY:

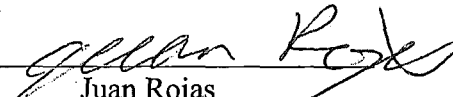
Material Witness: Francisco Meza-Carmona

Meza stated that he was going to pay a total of \$1,200 dollars to be crossed into the United States. Meza was at a house for approximately 3 days. On the day of the arrest, Meza was picked up around noon by a single male driver and taken to a park where he was instructed to climb in the trunk of the car he was found at the checkpoint.

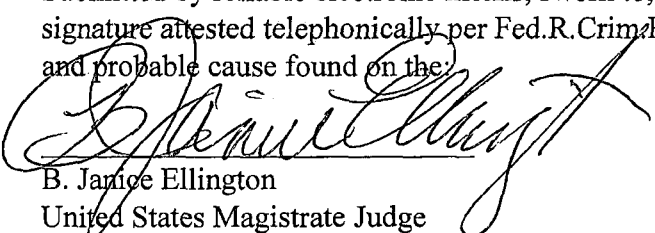
When presented with a six photo lineup containing Joanna Cecilia Lawrence, Meza was able to identify Lawrence as the driver of the car.

DISPOSITION:

The facts of this case were presented to Assistant United States Attorney Amanda Gould who accepted prosecution on Joanna Cecilia Lawrence for violating Title 8 USC 1324, alien smuggling. Francisco Meza-Carmona is being held as a material witness in this case.


Juan Rojas
Border Patrol Agent

Submitted by reliable electronic means, sworn to,
signature attested telephonically per Fed.R.Crim.P.4.1,
and probable cause found on the


B. Janice Ellington
United States Magistrate Judge